

**GOODMAN LAW FIRM, APC**

**Brett B. Goodman** (SBN 260899)  
11440 W. Bernardo Ct., Suite 300  
San Diego, CA 92127  
858.757.7262 Direct  
858.757.7270 Facsimile  
brett@goodmanlawapc.com

Attorneys for Defendant  
Consumer Adjustment Company, Inc.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ELETTRA MEEKS, JOSEPH  
DELACRUZ, STEPHANIE LAGUNA,  
AMBER LEONARD, and BECKY  
WITT, on behalf of themselves and  
others similarly situated,

*Plaintiffs,*

v.

EXPERIAN INFORMATION  
SOLUTIONS, INC.; MIDWEST  
RECOVERY SYSTEMS, LLC; and  
CONSUMER ADJUSTMENT  
COMPANY, INC.,

*Defendants.*

Case No.: 3:21-cv-03266-VC

**DEFENDANT CONSUMER  
ADJUSTMENT COMPANY, INC.'S  
ANSWER**

GOODMAN LAW FIRM, APC  
11440 W. Bernardo Ct., Suite 300  
San Diego, CA 92127

COMES NOW, Defendant Consumer Adjustment Company, Inc. (“CACI”), and files this Answer to Plaintiff’s Complaint and would respectfully show unto the Court as follows:

### PRELIMINARY STATEMENT

1. CACI denies Paragraph 1 as it pertains to CACI. CACI lacks knowledge or information sufficient to form a belief about the truth of the remainder of Paragraph 1; therefore, CACI denies the same.

2. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 2; therefore, CACI denies the same.

3. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 2; therefore, CACI denies the same.

4. CACI denies Paragraph 4 as an incomplete and/or inaccurate statement of law.

5. CACI denies Paragraph 5 as an incomplete and/or inaccurate statement of law.

6. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 6; therefore, CACI denies the same.

7. CACI denies Paragraph 7 as it pertains to CACI. CACI lacks knowledge or information sufficient to form a belief about the truth of the remainder of Paragraph 7; therefore, CACI denies the same.

8. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 8; therefore, CACI denies the same.

9. CACI denies Paragraph 9 to the extent it implies CACI committed any wrongdoing. CACI lacks knowledge or information sufficient to form a belief about the truth of the remainder of Paragraph 9; therefore, CACI denies the same.

10. CACI denies Paragraph 10 as it pertains to CACI. CACI lacks knowledge or information sufficient to form a belief about the truth of the remainder of Paragraph 10; therefore, CACI denies the same.

11. CACI denies Paragraph 11 as it pertains to CACI. CACI lacks knowledge or information sufficient to form a belief about the truth of the remainder of Paragraph

11; therefore, CACI denies the same.

## JURISDICTION AND VENUE

12. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 12; therefore, CACI denies the same.

13. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 13; therefore, CACI denies the same.

## PARTIES

14. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 14; therefore, CACI denies the same.

15. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 15; therefore, CACI denies the same.

16. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 16; therefore, CACI denies the same.

17. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 17; therefore, CACI denies the same.

18. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 18; therefore, CACI denies the same.

19. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 19; therefore, CACI denies the same.

20. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 20; therefore, CACI denies the same.

21. CACI admits that it is a corporation with its principal place of business in St. Louis, Missouri. CACI admits that at times it acts as a debt collector as defined by the relevant statutes. CACI lacks knowledge or information sufficient to form a belief about the truth of the remainder of Paragraph 21; therefore, CACI denies the same.

## FACTUAL ALLEGATIONS

22. CACI denies Paragraph 22 as an incomplete and/or inaccurate statement of

1 law.

2 23. CACI denies Paragraph 23 as an incomplete and/or inaccurate statement of  
3 law.

4 24. CACI denies Paragraph 24 as an incomplete and/or inaccurate statement of  
5 law.

6 25. CACI denies Paragraph 25 as an incomplete and/or inaccurate statement of  
7 law.

8 26. CACI denies Paragraph 26 as an incomplete and/or inaccurate statement of  
9 law.

10 27. CACI denies Paragraph 27 as an incomplete and/or inaccurate statement of  
11 law.

12 28. CACI denies Paragraph 28 as an incomplete and/or inaccurate statement of  
13 law.

14 29. CACI denies Paragraph 29 as an incomplete and/or inaccurate statement of  
15 law.

16 30. CACI denies Paragraph 30 as an incomplete and/or inaccurate statement of  
17 law.

18 31. CACI denies Paragraph 31 as an incomplete and/or inaccurate statement of  
19 law.

20 32. CACI denies Paragraph 32 as an incomplete and/or inaccurate statement of  
21 law.

22 33. CACI denies Paragraph 33 as an incomplete and/or inaccurate statement of  
23 law.

24 34. CACI denies Paragraph 34 as an incomplete and/or inaccurate statement of  
25 law.

26 35. CACI lacks knowledge or information sufficient to form a belief about the  
27 truth of Paragraph 35; therefore, CACI denies the same.

28 36. CACI denies Paragraph 36.

1 37. CACI lacks knowledge or information sufficient to form a belief about the  
2 truth of Paragraph 37; therefore, CACI denies the same.

3 38. CACI lacks knowledge or information sufficient to form a belief about the  
4 truth of Paragraph 38; therefore, CACI denies the same.

5 39. CACI lacks knowledge or information sufficient to form a belief about the  
6 truth of Paragraph 39; therefore, CACI denies the same.

7 40. CACI lacks knowledge or information sufficient to form a belief about the  
8 truth of Paragraph 40; therefore, CACI denies the same.

9 41. CACI lacks knowledge or information sufficient to form a belief about the  
10 truth of Paragraph 41; therefore, CACI denies the same.

11 42. CACI lacks knowledge or information sufficient to form a belief about the  
12 truth of Paragraph 42; therefore, CACI denies the same.

13 43. CACI lacks knowledge or information sufficient to form a belief about the  
14 truth of Paragraph 43; therefore, CACI denies the same.

15 44. CACI lacks knowledge or information sufficient to form a belief about the  
16 truth of Paragraph 44; therefore, CACI denies the same.

17 45. CACI lacks knowledge or information sufficient to form a belief about the  
18 truth of Paragraph 45; therefore, CACI denies the same.

19 46. CACI lacks knowledge or information sufficient to form a belief about the  
20 truth of Paragraph 46; therefore, CACI denies the same.

21 47. CACI lacks knowledge or information sufficient to form a belief about the  
22 truth of Paragraph 47; therefore, CACI denies the same.

23 48. CACI lacks knowledge or information sufficient to form a belief about the  
24 truth of Paragraph 48; therefore, CACI denies the same.

25 49. CACI lacks knowledge or information sufficient to form a belief about the  
26 truth of Paragraph 49; therefore, CACI denies the same.

27 50. CACI lacks knowledge or information sufficient to form a belief about the  
28 truth of Paragraph 50; therefore, CACI denies the same.

1 51. CACI denies Paragraph 51 to the extent it implies CACI committed any  
2 wrongdoing. CACI lacks knowledge or information sufficient to form a belief about  
3 the truth of the remainder of Paragraph 51; therefore, CACI denies the same.

4 52. CACI lacks knowledge or information sufficient to form a belief about the  
5 truth of Paragraph 52; therefore, CACI denies the same.

6 53. CACI lacks knowledge or information sufficient to form a belief about the  
7 truth of Paragraph 53; therefore, CACI denies the same.

8 54. CACI lacks knowledge or information sufficient to form a belief about the  
9 truth of Paragraph 54; therefore, CACI denies the same.

10 55. CACI lacks knowledge or information sufficient to form a belief about the  
11 truth of Paragraph 55; therefore, CACI denies the same.

12 56. CACI lacks knowledge or information sufficient to form a belief about the  
13 truth of Paragraph 56; therefore, CACI denies the same.

14 57. CACI lacks knowledge or information sufficient to form a belief about the  
15 truth of Paragraph 57; therefore, CACI denies the same.

16 58. CACI denies Paragraph 58 as it pertains to CACI. CACI lacks knowledge or  
17 information sufficient to form a belief about the truth of the remainder of Paragraph  
18 58; therefore, CACI denies the same.

19 59. CACI denies Paragraph 59 as an incomplete and/or inaccurate statement of  
20 law.

21 60. CACI lacks knowledge or information sufficient to form a belief about the  
22 truth of Paragraph 60; therefore, CACI denies the same.

23 61. CACI lacks knowledge or information sufficient to form a belief about the  
24 truth of Paragraph 61; therefore, CACI denies the same.

25 62. CACI denies Paragraph 62 to the extent it implies CACI committed any  
26 wrongdoing. CACI lacks knowledge or information sufficient to form a belief about  
27 the truth of the remainder of Paragraph 62; therefore, CACI denies the same.

28 63. CACI denies Paragraph 63 to the extent it implies CACI committed any

1 wrongdoing. CACI lacks knowledge or information sufficient to form a belief about  
2 the truth of the remainder of Paragraph 63; therefore, CACI denies the same.

3 64. CACI denies Paragraph 64 to the extent it applies to CACI. CACI lacks  
4 knowledge or information sufficient to form a belief about the truth of the remainder  
5 of Paragraph 64; therefore, CACI denies the same.

6 65. CACI admits that it reported and deleted an account pertaining to Plaintiff  
7 Delacruz.

8 66. CACI denies Paragraph 66.

9 67. CACI denies Paragraph 67 to the extent it applies to CACI. CACI lacks  
10 knowledge or information sufficient to form a belief about the truth of the remainder  
11 of Paragraph 67; therefore, CACI denies the same.

12 68. CACI lacks knowledge or information sufficient to form a belief about the  
13 truth of Paragraph 68; therefore, CACI denies the same.

14 69. CACI lacks knowledge or information sufficient to form a belief about the  
15 truth of Paragraph 69; therefore, CACI denies the same.

16 70. CACI lacks knowledge or information sufficient to form a belief about the  
17 truth of Paragraph 70; therefore, CACI denies the same.

18 71. CACI lacks knowledge or information sufficient to form a belief about the  
19 truth of Paragraph 71; therefore, CACI denies the same.

20 72. CACI lacks knowledge or information sufficient to form a belief about the  
21 truth of Paragraph 72; therefore, CACI denies the same.

22 73. CACI lacks knowledge or information sufficient to form a belief about the  
23 truth of Paragraph 73; therefore, CACI denies the same.

24 74. CACI lacks knowledge or information sufficient to form a belief about the  
25 truth of Paragraph 74; therefore, CACI denies the same.

26 75. CACI denies Paragraph 75 to the extent it applies to CACI. CACI lacks  
27 knowledge or information sufficient to form a belief about the truth of the remainder  
28 of Paragraph 75; therefore, CACI denies the same.



1 76. CACI lacks knowledge or information sufficient to form a belief about the  
2 truth of Paragraph 76; therefore, CACI denies the same.

3 77. CACI lacks knowledge or information sufficient to form a belief about the  
4 truth of Paragraph 77; therefore, CACI denies the same.

5 78. CACI lacks knowledge or information sufficient to form a belief about the  
6 truth of Paragraph 78; therefore, CACI denies the same.

7 79. CACI lacks knowledge or information sufficient to form a belief about the  
8 truth of Paragraph 79; therefore, CACI denies the same.

9 80. CACI lacks knowledge or information sufficient to form a belief about the  
10 truth of Paragraph 80; therefore, CACI denies the same.

11 81. CACI lacks knowledge or information sufficient to form a belief about the  
12 truth of Paragraph 81; therefore, CACI denies the same.

13 82. CACI lacks knowledge or information sufficient to form a belief about the  
14 truth of Paragraph 82; therefore, CACI denies the same.

15 83. CACI denies Paragraph 83 to the extent it applies to CACI. CACI lacks  
16 knowledge or information sufficient to form a belief about the truth of the remainder  
17 of Paragraph 83; therefore, CACI denies the same.

18 84. CACI lacks knowledge or information sufficient to form a belief about the  
19 truth of Paragraph 84; therefore, CACI denies the same.

20 85. CACI lacks knowledge or information sufficient to form a belief about the  
21 truth of Paragraph 85; therefore, CACI denies the same.

22 86. CACI lacks knowledge or information sufficient to form a belief about the  
23 truth of Paragraph 86; therefore, CACI denies the same.

24 87. CACI lacks knowledge or information sufficient to form a belief about the  
25 truth of Paragraph 87; therefore, CACI denies the same.

26 88. CACI lacks knowledge or information sufficient to form a belief about the  
27 truth of Paragraph 88; therefore, CACI denies the same.

28 89. CACI denies Paragraph 89 to the extent it applies to CACI. CACI lacks



1 knowledge or information sufficient to form a belief about the truth of the remainder  
2 of Paragraph 89; therefore, CACI denies the same.

### 3 **CLASS ALLEGATIONS**

4 90. CACI admits that Plaintiffs bring this suit as a class action against Experian.  
5 CACI lacks knowledge or information sufficient to form a belief about the truth of  
6 the remainder of Paragraph 90; therefore, CACI denies the same.

7 91. CACI admits that Plaintiffs bring this suit as a class action against Experian.  
8 CACI lacks knowledge or information sufficient to form a belief about the truth of  
9 the remainder of Paragraph 91; therefore, CACI denies the same.

10 92. CACI admits that Plaintiffs bring this suit as a class action against Experian.  
11 CACI lacks knowledge or information sufficient to form a belief about the truth of  
12 the remainder of Paragraph 92; therefore, CACI denies the same.

13 93. CACI admits that Plaintiffs bring this suit as a class action against Midwest  
14 Recovery. CACI lacks knowledge or information sufficient to form a belief about  
15 the truth of the remainder of Paragraph 93; therefore, CACI denies the same.

16 94. CACI admits that Plaintiffs bring this suit as a class action against Midwest  
17 Recovery. CACI lacks knowledge or information sufficient to form a belief about  
18 the truth of the remainder of Paragraph 94; therefore, CACI denies the same.

19 95. CACI admits that Plaintiffs bring this suit as a class action against Midwest  
20 Recovery. CACI lacks knowledge or information sufficient to form a belief about  
21 the truth of the remainder of Paragraph 95; therefore, CACI denies the same.

22 96. CACI admits that Plaintiffs bring this suit as a class action against CACI.  
23 CACI denies a class is appropriate for this matter.

24 97. CACI admits that Plaintiffs bring this suit as a class action against CACI.  
25 CACI denies a class is appropriate for this matter.

26 98. CACI admits that Plaintiffs bring this suit as a class action against CACI.  
27 CACI denies a class is appropriate for this matter.

28 99. CACI admits that Plaintiffs bring this suit as a class action. CACI denies a

1 class is appropriate for this matter.

2 100. CACI admits that Plaintiffs bring this suit as a class action. CACI denies a  
3 class is appropriate for this matter.

4 101. CACI admits that Plaintiffs bring this suit as a class action. CACI denies a  
5 class is appropriate for this matter.

6 102. CACI admits that Plaintiffs bring this suit as a class action. CACI denies a  
7 class is appropriate for this matter.

8 103. CACI admits that Plaintiffs bring this suit as a class action. CACI denies a  
9 class is appropriate for this matter.

## 10 **CLAIMS FOR RELIEF**

### 11 **COUNT ONE**

12 104. CACI repeats and realleges the preceding paragraphs as though fully restated  
13 herein.

14 105. CACI admits that Plaintiffs bring this case as a class action against Experian.

15 106. CACI lacks knowledge or information sufficient to form a belief about the  
16 truth of Paragraph 106; therefore, CACI denies the same.

17 107. CACI lacks knowledge or information sufficient to form a belief about the  
18 truth of Paragraph 107; therefore, CACI denies the same.

19 108. CACI lacks knowledge or information sufficient to form a belief about the  
20 truth of Paragraph 108; therefore, CACI denies the same.

21 109. CACI lacks knowledge or information sufficient to form a belief about the  
22 truth of Paragraph 109; therefore, CACI denies the same.

23 110. CACI lacks knowledge or information sufficient to form a belief about the  
24 truth of Paragraph 110; therefore, CACI denies the same.

25 111. CACI lacks knowledge or information sufficient to form a belief about the  
26 truth of Paragraph 111; therefore, CACI denies the same.

### 27 **COUNT TWO**

28 112. CACI repeats and realleges the preceding paragraphs as though fully restated

herein.

113. CACI admits that Plaintiffs bring this case as a class action against Experian.

114. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 114; therefore, CACI denies the same.

115. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 115; therefore, CACI denies the same.

116. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 116; therefore, CACI denies the same.

117. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 117; therefore, CACI denies the same.

118. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 118; therefore, CACI denies the same.

119. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 119; therefore, CACI denies the same.

120. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 120; therefore, CACI denies the same.

### COUNT THREE

121. CACI repeats and realleges the preceding paragraphs as though fully restated herein.

122. CACI admits that Plaintiffs bring this case as a class action against Experian.

123. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 123; therefore, CACI denies the same.

124. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 124; therefore, CACI denies the same.

125. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 125; therefore, CACI denies the same.

126. CACI lacks knowledge or information sufficient to form a belief about the truth of Paragraph 126; therefore, CACI denies the same.

1 127. CACI lacks knowledge or information sufficient to form a belief about the  
2 truth of Paragraph 127; therefore, CACI denies the same.

3 128. CACI lacks knowledge or information sufficient to form a belief about the  
4 truth of Paragraph 128; therefore, CACI denies the same.

5 129. CACI lacks knowledge or information sufficient to form a belief about the  
6 truth of Paragraph 129; therefore, CACI denies the same.

7 130. CACI lacks knowledge or information sufficient to form a belief about the  
8 truth of Paragraph 130; therefore, CACI denies the same.

9 131. CACI lacks knowledge or information sufficient to form a belief about the  
10 truth of Paragraph 131; therefore, CACI denies the same.

11 **COUNT FOUR**

12 132. CACI repeats and realleges the preceding paragraphs as though fully restated  
13 herein.

14 133. CACI admits that Plaintiffs bring this case as a class action against Experian.

15 134. CACI lacks knowledge or information sufficient to form a belief about the  
16 truth of Paragraph 134; therefore, CACI denies the same.

17 135. CACI lacks knowledge or information sufficient to form a belief about the  
18 truth of Paragraph 135; therefore, CACI denies the same.

19 136. CACI lacks knowledge or information sufficient to form a belief about the  
20 truth of Paragraph 136; therefore, CACI denies the same.

21 137. CACI lacks knowledge or information sufficient to form a belief about the  
22 truth of Paragraph 137; therefore, CACI denies the same.

23 **COUNT FIVE**

24 138. CACI repeats and realleges the preceding paragraphs as though fully restated  
25 herein.

26 139. CACI admits that Plaintiff brings this case as a class action. CACI denies that  
27 a class is appropriate.

28 140. CACI denies Paragraph 140 to the extent it applies to CACI. CACI lacks

1 knowledge or information sufficient to form a belief about the truth of the remainder  
2 of Paragraph 140; therefore, CACI denies the same.

3 141. CACI denies Paragraph 141 to the extent it applies to CACI. CACI lacks  
4 knowledge or information sufficient to form a belief about the truth of the remainder  
5 of Paragraph 141; therefore, CACI denies the same.

6 142. CACI denies Paragraph 142 to the extent it applies to CACI. CACI lacks  
7 knowledge or information sufficient to form a belief about the truth of the remainder  
8 of Paragraph 142; therefore, CACI denies the same.

9 143. CACI denies Paragraph 143 to the extent it applies to CACI. CACI lacks  
10 knowledge or information sufficient to form a belief about the truth of the remainder  
11 of Paragraph 143; therefore, CACI denies the same.

12 144. CACI denies Paragraph 144 to the extent it applies to CACI. CACI lacks  
13 knowledge or information sufficient to form a belief about the truth of the remainder  
14 of Paragraph 144; therefore, CACI denies the same.

15 145. CACI denies Paragraph 145 to the extent it applies to CACI. CACI lacks  
16 knowledge or information sufficient to form a belief about the truth of the remainder  
17 of Paragraph 145; therefore, CACI denies the same.

18 146. CACI denies Paragraph 146 to the extent it applies to CACI. CACI lacks  
19 knowledge or information sufficient to form a belief about the truth of the remainder  
20 of Paragraph 146; therefore, CACI denies the same.

## 21 **COUNT SIX**

22 147. CACI repeats and realleges the preceding paragraphs as though fully restated  
23 herein.

24 148. CACI admits that Plaintiff brings this case as a class action. CACI denies that  
25 a class is appropriate.

26 149. CACI denies Paragraph 149 to the extent it applies to CACI. CACI lacks  
27 knowledge or information sufficient to form a belief about the truth of the remainder  
28 of Paragraph 149; therefore, CACI denies the same.

1 150. CACI denies Paragraph 150 to the extent it applies to CACI. CACI lacks  
2 knowledge or information sufficient to form a belief about the truth of the remainder  
3 of Paragraph 150; therefore, CACI denies the same.

4 151. CACI denies Paragraph 151 to the extent it applies to CACI. CACI lacks  
5 knowledge or information sufficient to form a belief about the truth of the remainder  
6 of Paragraph 151; therefore, CACI denies the same.

7 152. CACI denies Paragraph 152 to the extent it applies to CACI. CACI lacks  
8 knowledge or information sufficient to form a belief about the truth of the remainder  
9 of Paragraph 152; therefore, CACI denies the same.

10 153. CACI denies Paragraph 153 to the extent it applies to CACI. CACI lacks  
11 knowledge or information sufficient to form a belief about the truth of the remainder  
12 of Paragraph 153; therefore, CACI denies the same.

13 154. CACI denies Paragraph 154 to the extent it applies to CACI. CACI lacks  
14 knowledge or information sufficient to form a belief about the truth of the remainder  
15 of Paragraph 154; therefore, CACI denies the same.

16 **COUNT NINE**

17 155. CACI repeats and realleges the preceding paragraphs as though fully restated  
18 herein.

19 156. CACI admits that Plaintiff brings this case as a class action. CACI denies that  
20 a class is appropriate.

21 157. CACI denies Paragraph 157 to the extent it applies to CACI. CACI lacks  
22 knowledge or information sufficient to form a belief about the truth of the remainder  
23 of Paragraph 157; therefore, CACI denies the same.

24 158. CACI denies Paragraph 158 to the extent it applies to CACI. CACI lacks  
25 knowledge or information sufficient to form a belief about the truth of the remainder  
26 of Paragraph 158; therefore, CACI denies the same.

27 159. CACI lacks knowledge or information sufficient to form a belief about the  
28 truth of Paragraph 159; therefore, CACI denies the same.

1 160. CACI denies Paragraph 160 to the extent it applies to CACI. CACI lacks  
2 knowledge or information sufficient to form a belief about the truth of the remainder  
3 of Paragraph 160; therefore, CACI denies the same.

4 161. CACI denies Paragraph 161 to the extent it applies to CACI. CACI lacks  
5 knowledge or information sufficient to form a belief about the truth of the remainder  
6 of Paragraph 161; therefore, CACI denies the same.

7 162. CACI denies Paragraph 162 to the extent it applies to CACI. CACI lacks  
8 knowledge or information sufficient to form a belief about the truth of the remainder  
9 of Paragraph 162; therefore, CACI denies the same.

10 **COUNT ELEVEN**

11 163. CACI repeats and realleges the preceding paragraphs as though fully restated  
12 herein.

13 164. CACI admits that Plaintiff brings this case as a class action. CACI denies that  
14 a class is appropriate.

15 165. CACI denies Paragraph 165 to the extent it applies to CACI. CACI lacks  
16 knowledge or information sufficient to form a belief about the truth of the remainder  
17 of Paragraph 165; therefore, CACI denies the same.

18 166. CACI denies Paragraph 166 to the extent it applies to CACI. CACI lacks  
19 knowledge or information sufficient to form a belief about the truth of the remainder  
20 of Paragraph 166; therefore, CACI denies the same.

21 167. CACI denies Paragraph 167 to the extent it applies to CACI. CACI lacks  
22 knowledge or information sufficient to form a belief about the truth of the remainder  
23 of Paragraph 167; therefore, CACI denies the same.

24 168. CACI denies Paragraph 168 to the extent it applies to CACI. CACI lacks  
25 knowledge or information sufficient to form a belief about the truth of the remainder  
26 of Paragraph 168; therefore, CACI denies the same.

27 169. CACI denies Paragraph 169 to the extent it applies to CACI. CACI lacks  
28 knowledge or information sufficient to form a belief about the truth of the remainder



1 of Paragraph 169; therefore, CACI denies the same.

2 170. CACI denies Paragraph 170 to the extent it applies to CACI. CACI lacks  
3 knowledge or information sufficient to form a belief about the truth of the remainder  
4 of Paragraph 170; therefore, CACI denies the same.

### 5 **PRAYER FOR RELIEF**

6 171. CACI denies Plaintiff's Prayer for Relief and its subparts and denies that  
7 Plaintiff is entitled to any damages or relief. CACI further denies that a class is  
8 appropriate for this matter.

### 9 **AFFIRMATIVE DEFENSES**

10 172. Plaintiffs have failed to mitigate damages, if any.

11 173. Plaintiffs' damages, if any, are the result of pre-existing injuries.

12 174. Any violation, if it occurred, is a result of a bona fide error.

13 175. Plaintiffs' damages complained of are the result of a third party over whom  
14 CACI has no control.

15 176. Conditions precedent have not been met.

16 177. Plaintiffs have not suffered concrete injuries-in-fact.

17 WHEREFORE, PREMISES CONSIDERED, Defendant Consumer Adjustment  
18 Company, Inc., respectfully requests that this Court dismiss with prejudice all claims  
19 against Defendant.

20  
21 DATED: June 2, 2021

22 **GOODMAN LAW FIRM, APC**

23 By: /s/ Brett B. Goodman

24 Brett B. Goodman

25 Attorneys for Defendant

26 Consumer Adjustment Company, Inc.  
27  
28

**CERTIFICATE OF SERVICE**

I certify that on June 2, 2021, a copy of the foregoing was filed and served electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

DATED: June 2, 2021

**GOODMAN LAW FIRM, APC**

By: /s/ Brett B. Goodman  
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